

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

v.

MARTY SMALL, SR., in his official
capacity as Mayor of Atlantic City, New
Jersey, and individually,

LA'QUETTA SMALL-FRAZIER, in her
official capacity as Former Principal of
Pennsylvania Avenue School, and
individually,

BARRY CALDWELL, in his official
capacity as current Superintendent of the
Atlantic City School District,

PAUL A. SPAVENTA, in his official
capacity as former Interim Superintendent of
the Atlantic City School District,

ATLANTIC CITY BOARD OF
EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an individual,

Defendants.

Civil Action No.: 1:21-cv-11189

**CERTIFICATION OF
ANDRES JALON, ESQ.
IN SUPPORT OF PLAINTIFF'S
MOTION FOR HIS ADMISSION
*PRO HAC VICE***

I, Andres Jalon, Esquire, of full age, being duly sworn, according to law, upon my oath do hereby depose and say:

1. I am an attorney-at-law of the Commonwealth of Pennsylvania and am chief counsel with the law firm Jalon & Associates.
2. Due to my extensive litigation experience, Lento Law Group, P.C., attorneys for Plaintiff, JANE DOE on behalf of JOHN DOE, her minor child, in the above-captioned matter, seek to bring

me into this litigation to assist in representing the Plaintiff, and as such, have made me fully familiar with the facts of this matter.

3. I submit this Certification in support of the application of the Plaintiff for my admission *pro hac vice*, as Co-Counsel for the Plaintiff along with Terrell A. Ratliff, Plaintiff's Counsel of Record in this matter.

4. I am a member in good standing of the bar in the Commonwealth of Pennsylvania since 1999.

5. Additionally, I am a member in good standing of the Federal Bar of Pennsylvania, Eastern District since approximately 2002, and the Middle District, since earlier this year.

6. The name and address of the officials or offices that maintain the roll of such members of the bar listed above are as follows:

STATE:

State Bar of Pennsylvania

Membership Department
601 Commonwealth Avenue, Suite 3600
Harrisburg, PA 17120-0901
(717) 231-3350

FEDERAL:

United States District Court, Eastern District of Pennsylvania

Membership Department
James A. Byrne U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
(215) 597-7704

United States District Court, Middle District of Pennsylvania

Membership Department
William J. Nealon Federal Bldg. & U.S. Courthouse
235 N. Washington Avenue
Scranton, PA 18503
(570) 207-5682

7. No disciplinary charges have been filed against me in any jurisdiction, nor has any discipline previously been imposed against me, ever.

8. Pursuant to L. Civ. R. 101.1(c)(1), I understand that I am required to promptly advise the Court of the disposition of any pending disciplinary charges, or the institution of new charges.

9. I further understand that I shall be bound by the Federal and Local Rules and am within the disciplinary jurisdiction of this Court throughout the period of my admission *pro hac vice*.

10. I agree to submit to all rules of practice and procedure for this Court, and will work closely with the attorney of record, Terrell A. Ratliff, Esq., in connection with this case.

11. Annexed hereto as **EXHIBIT “A”** is a recent certificate evidencing my good standing with the Commonwealth of Pennsylvania.

12. The fee required per L. Civ. R. 101.1(c)(2) and New Jersey Court Rule 1:28-2 will be provided to the New Jersey Lawyers’ Fund for Client Protection within twenty (20) days of the entry of the Court’s Order admitting me *pro hac vice*.

13. Further, payment in the amount of \$150.00 shall be made to the Clerk of the United States District Court as per L. Civ. R. 101.1(c)(3) within twenty (20) days of the entry of the Court’s Order admitting me *pro hac vice*.

14. WHEREFORE, I, Andres Jalon, Esq., respectfully request that this Honorable Court admit me *pro hac vice* pursuant to the Federal and Local Rules of Civil Procedure as aforesaid.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: March 22, 2022

JALON & ASSOCIATES

A handwritten signature in black ink, appearing to read 'Andres Jalon', is written over a horizontal line.

ANDRES JALON, ESQUIRE

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